

PACHULSKI STANG ZIEHL & JONES LLP

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Counsel for the Debtor and Debtor-in-Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹	§	Case No. 19-34054-sgj11
	§	
Debtor.	§	
	§	

**DEBTOR'S AMENDED WITNESS AND EXHIBIT LIST WITH
RESPECT TO DEBTOR'S OBJECTION TO PATRICK HAGAMAN
DAUGHERTY'S MOTION FOR TEMPORARY ALLOWANCE OF
CLAIM FOR VOTING PURPOSES PURSUANT TO BANKRUPTCY RULE 3018**

Highland Capital Management, L.P. (the "Debtor") submits the following *Amended*

Witness and Exhibit List with Respect to Debtor's Objection to Patrick Hagaman Daugherty's

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Motion for Temporary Allowance of Claim for Voting Purposes Pursuant to Bankruptcy Rule 3018, which the Court has set for hearing at 1:30 p.m. (Central Time) on November 17, 2020, in the above-styled bankruptcy case (the “Bankruptcy Case”).

A. Witnesses:

1. Patrick Hagaman Daugherty
2. James Seery, Jr.
3. Any witness identified by or called by any other party; and
4. Any witness necessary for rebuttal.

B. Exhibits:

No.	Exhibit	Offered	Admitted
A.	Declaration of John A. Morris in Support of Debtor’s Objection to Patrick Hagaman Daugherty Motion for Temporary Allowance of Claim for Voting Purposes Pursuant to Bankruptcy Rule 3018, and exhibits annexed thereto [Docket No. 1350]		
B.	HERA Amended and Restated Limited Liability Company Agreement		
C.	HERA Second Amended and Restated Limited Liability Company Agreement		
D.	1 st Amendment to HERA Second Amended and Restated Limited Liability Company Agreement		
E.	2 nd Amendment to HERA Second Amended and Restated Limited Liability Company Agreement		
F.	3 rd Amendment to HERA Second Amended and Restated Limited Liability Company Agreement		
G.	Board Resolutions Approving Transfer and 3 rd Amendment to HERA Second Amended and Restated Limited Liability Company Agreement		
H.	HERA Member Consents Approving Transfer and 3 rd Amendment to HERA Second Amended and Restated Limited Liability Company Agreement		
I.	Highland Capital Management, L.P. 2004 K-1		

No.	Exhibit	Offered	Admitted
J.	Highland Capital Management, L.P. 2005 K-1		
K.	Highland Capital Management, L.P. 2006 K-1		
L.	Highland Capital Management, L.P. 2007 K-1		
M.	Highland Capital Management, L.P. 2008 K-1		
N.	Highland Capital Management, L.P. 2009 K-1		
O.	Highland Capital Management, L.P. 2010 K-1		
P.	Highland Capital Management, L.P. 2011 K-1		
Q.	Transcript of Deposition Patrick H. Daugherty (June 14, 2013)		
R.	Verified Complaint (Daugherty v. HCMLP)		
S.	Motion to Dismiss Verified Complaint		
T.	Opening Brief in Support of Motion to Dismiss Verified Complaint		
U.	Patrick Daugherty's Answering Brief in Opposition to Defendants' Motion to Dismiss		
V.	Order Granting, in Part, and Denying, in Part, Defendants' Motion to Dismiss		
W.	Any document entered or filed in the Bankruptcy Case, including any exhibits thereto		
X-1	Secretary's Certificate dated August 4, 2009		
X-2	Signed lists of officers of Strand Advisors Inc. for years 2006-2011		

No.	Exhibit	Offered	Admitted
Y.	All exhibits identified by or offered by any other party at the hearing		

Dated: November 18, 2020.

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-and-

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